

Seyfarth Shaw LLP  
Christian J. Rowley (SBN 187293)  
560 Mission Street, 31st Floor  
San Francisco, California 94105  
Telephone: (415) 397-2823  
Facsimile: (415) 397-8549  
crowley@seyfarth.com

Richard L. Alfred (SBN 015000) (*pro hac vice*)  
Two Seaport Lane, Suite 300  
Boston, Massachusetts 02210  
Telephone: (617) 496-4802  
Facsimile: (617) 946-4801  
ralfred@seyfarth.com

Timothy M. Watson (SBN 20963575) (*pro hac vice*)  
700 Milam Street, Suite 1400  
Houston, Texas 77002-2812  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340  
twatson@seyfarth.com

Attorneys for Defendants

Padilla & Rodriguez, LLP  
John M. Padilla (SBN 279815)  
jpadilla@pandrlaw.com  
601 S. Figueroa St., Suite 4050  
Los Angeles, California 90017  
Telephone: (213) 244-1401  
Facsimile: (213) 244-1402

Wills Law Firm, PLLC  
Rhonda H. Wills (*pro hac vice*)  
rwills@rwillslawfirm.com  
Genevieve Estrada (*pro hac vice*)  
gestrada@rwillslawfirm.com  
1776 Yorktown, Suite 570  
Houston, Texas 77056  
Telephone: (713) 528-4455  
Facsimile: (713) 528-2047

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

KELLY CARROLL, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, and WELLS  
FARGO BANK, N.A.,

Defendants.

**Case No. 3:15-CV-02321-EMC**

**STIPULATION CONCERNING  
DEADLINE FOR MEDIATION,  
CLASS CERTIFICATION MOTION  
AND HEARING AND FURTHER  
CASE MANAGEMENT  
CONFERENCE**

Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, Plaintiff Kelly Carroll ("Plaintiff")  
and Defendants Wells Fargo & Co. and Wells Fargo Bank, N.A. ("Defendants" or "Wells  
Fargo") hereby stipulate as follows:

1 WHEREAS, during the January 14, 2016 hearing in this matter, the Honorable Court  
2 ordered the parties in the above-referenced matter to mediation within 90 days of January 14,  
3 2016, or by April 13, 2016.

4 WHEREAS, in the Court's minute entry, the Court set certain other deadlines and  
5 hearings that the parties understood were determined in part based on the mediation deadline,  
6 since the parties and the Court discussed the desire to limit discovery costs to the extent the case  
7 could be settled.

8  
9 WHEREAS, the parties have worked diligently to agree to a mediator and set a mediation  
10 date. The parties have agreed, subject to the Court approving the extension of the mediation  
11 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,  
12 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

13  
14 WHEREAS, the parties have agreed to the stipulated dates herein, subject to approval of  
15 the Court.

16 THEREFORE, THE PARTIES AGREE AND STIPULATE TO THE FOLLOWING  
17 subject to approval by the Court:

- 18 1. The parties' are Ordered to mediate this matter by June 30, 2016.
- 19 2. The deadline for Plaintiff to file her Motion for Class Certification is extended to  
20 August 31, 2016.
- 21 3. Defendants' Opposition to Plaintiff's Motion for Class Certification is due September  
22 30, 2016.
- 23 4. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class  
24 Certification is due October 19, 2016.
- 25 5. The Further Case Management Conference is rescheduled from October 6, 2016 to  
26 November 17, 2016 at 1:30 PM in Courtroom 5, 17<sup>th</sup> Floor, San Francisco.
- 27  
28

6. The Motion for Class Certification Hearing is rescheduled from October 6, 2016 to November 17, 2016 at 1:30 PM in Courtroom 5, 17<sup>th</sup> Floor, San Francisco.

7. The deadline for filing of the Further Case Management Statement is extended from September 29, 2016 to November 10, 2016.

Pursuant to Local Rule 6-2, there have been no other time modifications on the motion that is the subject of this Stipulation, and it is not anticipated that this extension will affect the schedule for the case. Also pursuant to Local Rule 6-2, the declaration of Rhonda H. Wills is attached as Exhibit A to the Stipulation.

**IT IS SO STIPULATED.**

Dated: March 4, 2016

By: /s/ Rhonda H. Wills  
Rhonda H. Wills (*pro hac vice*)  
Email: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)  
WILLS LAW FIRM, PLLC  
1776 Yorktown, Suite 570  
Houston, Texas 77056  
Telephone: (713) 528-4455  
Facsimile: (713) 528-2047

John M. Padilla (Cal. Bar No. 279815)  
Email: [jpadilla@pandrlaw.com](mailto:jpadilla@pandrlaw.com)  
PADILLA & RODRIGUEZ, L.L.P.  
601 South Figueroa Street, Suite 4050  
Los Angeles, CA 90017  
Telephone: (213) 244-1401  
Facsimile: (213) 244-1402

Dated: March 4, 2016

By: /s/ Timothy M. Watson  
Timothy Watson (SBN 20963575) (*pro hac vice*)  
Email: [twatson@seyfarth.com](mailto:twatson@seyfarth.com)  
SEYFARTH SHAW LLP  
700 Milam Street, Suite 1400  
Houston, Texas 77002-2812  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340

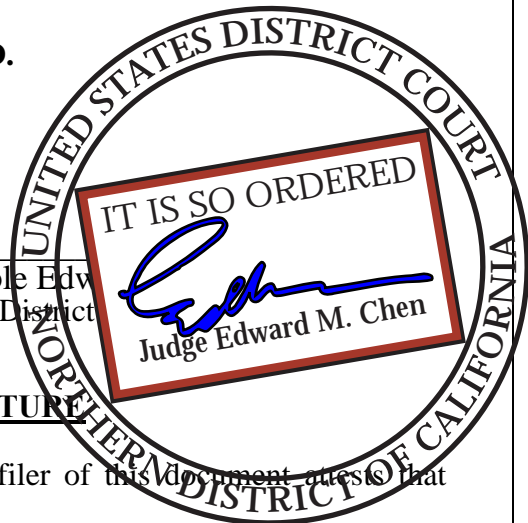
Christian J. Rowley (SBN 187293)  
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Email: ralfred@seyfarth.com  
SEYFARTH SHAW LLP  
Two Seaport Lane, Suite 300  
Boston, Massachusetts 02210  
Telephone: (617) 496-4802  
Facsimile: (617) 946-4801

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 3 / 4, 2016

The Honorable Edw  
United States District



**ATTESTATION OF SIGNATURE**

Pursuant to Civil Local Rules 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: March 4, 2016

By: /s/ Rhonda H. Wills  
Rhonda H. Wills (*pro hac vice*)  
Email: rwills@rwillslawfirm.com  
WILLS LAW FIRM, PLLC  
1776 Yorktown, Suite 570  
Houston, Texas 77056  
Telephone: (713) 528-4455  
Facsimile: (713) 528-2047

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jpadilla@pandrlaw.com  
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Telephone: (213) 244-1401  
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rwills@rwillslawfirm.com  
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gestrada@rwillslawfirm.com  
**WILLS LAW FIRM, PLLC**  
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Houston, Texas 77056  
Telephone: (713) 528-4455  
Facsimile: (713) 528-2047

ATTORNEYS FOR PLAINTIFF  
AND THE PUTATIVE CLASSES

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

KELLY CARROLL, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, and WELLS  
FARGO BANK, N.A.,

Defendants.

Case No. 3:15-CV-02321-EMC

**DECLARATION OF RHONDA H.  
WILLS IN SUPPORT OF  
STIPULATION CONCERNING  
DEADLINE FOR MEDIATION,  
CLASS CERTIFICATION MOTION  
AND HEARING AND FURTHER  
CASE MANAGEMENT  
CONFERENCE**

1 I, Rhonda H. Wills, declare as follows:

2 1. I am managing partner of Wills Law Firm, PLLC, one of the firms serving as  
3 Plaintiff's counsel herein. I make these statements based on personal knowledge and would so  
4 testify if called as a witness.

5 2. This Declaration is submitted in support of the Parties' Stipulation Concerning  
6 Deadline for Mediation, Class Certification Motion and Hearing and Further Case Management  
7 Conference.

8 3. During the January 14, 2016 hearing in this matter, the Honorable Court ordered  
9 the parties in the above-referenced matter to mediation within 90 days of January 14, 2016, or by  
10 April 13, 2016. In the Court's minute entry, the Court set certain other deadlines and hearings  
11 that Plaintiff's counsel understood were determined in part based on the mediation deadline,  
12 since the parties and the Court discussed the desire to limit discovery costs to the extent the case  
13 could be settled.

14 4. The parties have worked diligently to agree to a mediator and set a mediation  
15 date. The parties have agreed, subject to the Court approving the extension of the mediation  
16 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,  
17 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

18 5. Therefore, the parties have agreed and stipulated to the following subject to  
19 approval by the Court:

- 20 a. Mediation to occur June 30, 2016.
- 21 b. Plaintiffs to file their Motion for Class Certification by August 31, 2016.
- 22 c. Defendants' Opposition to Plaintiff's Motion for Class Certification is due  
23 September 30, 2016.
- 24 d. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class  
25 Certification is due October 19, 2016.
- 26 e. Further case Management Conference on November 17, 2016 at 1:30 PM  
27 in Courtroom 5, 17<sup>th</sup> Floor, San Francisco.
- 28



f. Motion for Class Certification Hearing on November 17, 2016 at 1:30 PM  
in Courtroom 5, 17<sup>th</sup> Floor, San Francisco.

g. Deadline for filing of the Further Case Management Statement is  
November 10, 2016.

6. Pursuant to Local Rule 6-2, there have been no other time modifications on the  
motion that is the subject of the Parties' Stipulation, and it is not anticipated that this extension  
will affect the schedule for the case.

\* \* \*

I declare under penalty of perjury under the laws of the United States and the State of  
California that the foregoing is true and correct. Executed this 4 day of March, 2016,  
at Houston, Texas.

w/p Rhonda H. Wills  
Rhonda H. Wills